

EXHIBIT 2

Proof of Claim: <CLAIM NUMBER>
Claimant: <CLAIMANT NAME>

Joel Martinez Santiago

INFORMATION REQUESTED TO PROCESS YOUR CLAIM

Instructions

Please answer all four (4) questions and any applicable sub-questions. Please include as much detail as possible in your responses. Your answers should provide more information than the initial proof of claim. For example, if you previously wrote as the basis for your claim "Ley 96," please elaborate as to the specific laws on which you are purporting to rely, the year the law at issue was enacted, and how and why you believe such particular law provides a basis for your claim. Additionally, if available and applicable to your claim, please provide:

- Copy of a pleading, such as a Complaint or an Answer;
- Any unpaid judgment or settlement agreement;
- Written notice of intent to file a claim with proof of mailing;
- Any and all documentation you believe supports your claim.

Please send the completed form and any supporting documents via email to PRClaimsInfo@primeclerk.com, or by mail or hand delivery to the following address:

Commonwealth of Puerto Rico Supplemental Information Processing Center
c/o Prime Clerk, LLC
850 Third Avenue, Suite 412
Brooklyn, NY 11232

Questionnaire

1. What is the basis of your claim?

- ☐ A pending or closed legal action with or against the Puerto Rican government
- ☒ Current or former employment with the Government of Puerto Rico
- ☐ Other (Provide as much detail as possible below. Attach additional pages if needed.)

2. What is the amount of your claim (how much money do you claim to be owed):

3. Employment. Does your claim relate to current or former employment with the Government of Puerto Rico?

- ☐ No. Please continue to Question 4.
- ☒ Yes. Answer Questions 3(a)-(d).

3(a). Identify the specific agency or department where you were or are employed:

[hw:] Department of Transportation and Public Works as mechanical assistant for automotive equipment, Ponce regional office, the Commonwealth.

3(b). Identify the dates of your employment related to your claim:

[hw:] From May 10, 1994, to the present

3(c). Last four digits of your social security number: 6835

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3(d). What is the nature of your employment claims (select all applicable):

- ☐ Pension
- ☒ Unpaid Wages
- ☐ Sick Days
- ☐ Union Grievance
- ☐ Vacation
- ☐ Other (Provide as much detail as possible. Attach additional pages if necessary).

[hw:] Act 89 – 1995, Act 96 – 2002, Act 164 – 2003, Act 164 – 2004 and
Act 109 – 2008.

4. Legal Action. Does your claim relate to a pending or closed legal action?

- ☒ No.
- ☐ Yes. Answer Questions 4(a)-(f).

4(a). Identify the department or agency that is a party to the action.

N/A

4(b). Identify the name and address of the court or agency where the action is pending:

N/A

4(c). Case number:

N/A

4(d). Title, Caption, or Name of Case:

N/A

4(e). Status of the case (pending, on appeal, or concluded):

N/A

4(f). Do you have an unpaid judgment? Yes / No (Circle one)

If yes, what is the date and amount of the judgment?

N/A

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[handwritten:] *Claimant: Joel Martínez Santiago*

Case number: 17 BK 3283-LTS

Claim Number: ----

Claim for money owed under laws passed to which I am entitled due to my years of service from May 10, 1994, to the present as Mechanic's Assistant for Automotive Equipment - Ponce Regional Office – in the Department of Transportation and Public Works of the Commonwealth of Puerto Rico.

	<i>Amount owed</i>
<i>(1) Act 89 – July 1995 – Romerazo</i>	<i>\$30,000.00</i>
<i>(2) Act 96 – July 2002 – Salary increase</i>	<i>\$21,600.00</i>
<i>(3) Act 164 – July 2003 – Salary increase</i>	<i>\$20,400.00</i>
<i>(4) Act 164 – January 2004 – Sila M. Calderón</i>	<i>\$19,200.00</i>
<i>(5) Act 109 – June 2008 – Salary Scale – Steps</i>	<i>\$14,400.00</i>
	<hr/>
	<i>Total = \$105,600.00</i>

As well as other laws that apply to me and under which I have not received the appropriate compensation.

Thank you for your attention to this matter.

Sincerely,

[signature]

[signed:] Joel Martinez Santiago

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[handwritten:] *Re: Joel Martínez Santiago*

Cell phone: 787-243-1866

*Address: Urb. Alturas del Cafetal
B-15 Calle Anturio
Yauco, Puerto Rico, 00698*

Claim Number: ----

Date Submitted:

Debtor: Commonwealth of Puerto Rico

I am hereby sending the following for my claim submitted on :

(1) Proof that I worked for the Department of Transportation and Public Works as mechanical assistant at the Ponce Regional Office of the Commonwealth of Puerto Rico, from May 10, 1994, to the present. (see attached proof.)

(2) The amount of money owed under my claim is: \$105,600.

Please consider my claim with the information and proof indicated here.

Thank you very much,

[signature]

Joel Martinez Santiago

Date: June 17, 2020

OMNIBUS OBJECTION RESPONSE

I. CONTACT INFORMATION

Name: [hw:] *Joel Martinez Santiago*
Address: [hw:] *Urb. Alturas del Cafetal*
B-15 Calle Anturio
Yauco, Puerto Rico, 00698
Telephone: [hw:] *787-243-1866*

II. Heading

A. Clerk's Office

United States District Court
Room 150 Federal Building
San Juan, Puerto Rico 00918-1767

B. Commonwealth of Puerto Rico et al (Debtors)

C. Case Number: 17 BK 3283 – LTS

D. Omnibus Objection to the request for moneys unpaid by the Commonwealth of Puerto Rico.

Number of the Proofs of Claim:

#49762 – Act #89 – Romerazo – Effective July 1, ~~1996~~ [hw:] *1995*

#94057 – Salary Scale – Steps Law, dated June 6, 2008

#96621 – Act #96 (2002) by Dr. Pedro Roselló – effective July 2002

Act #164 (2004) by Mrs. Sila Calderón – effective January 2004

[hw:] *Act #164 (2003) Salary increase July, 2003*

III. The Court should not grant the Omnibus Objection, since this is money owed by approval of the following laws by the government of the Commonwealth of Puerto Rico:

Act 89 Romerazo – Effective July 1, ~~1996~~ [hw:] *1995*

Salary Scale – Steps Law Dated June 6, 2008

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Act #96 (2002) by Dr. Pedro Roselló – effective July, 2002

Act #164 (2004) by Mrs. Sila M. Calderón effective January 2004

[hw:] *Act #164 (2003) Salary increase July, 2003*

IV. Supporting Documentation

Includes documents that prove years of service with the Department of [hw:] *Transportation and Public Works* ~~Education~~ of Puerto Rico, from [hw:] *May 10, 1994*, until [hw:] *the present*. [cut off] years) of work as [hw:] *mechanical assistant for Automotive Equipment, Ponce region, Commonwealth*.

This is being claimed by applicable laws that cover these years of ~~educational~~ service.

Documents are included that prove this claim.

[hw:] *(1) Verification of employment with the Department of Transportation and Public Works – Automotive service center, Ponce regional office, as mechanical assistant for Automotive Equipment for the Commonwealth of Puerto Rico.*

Due to the recent emergency situation due to earthquakes in Puerto Rico, the responses are being sent on this date. If you need additional information or documents, please contact the undersigned.

[signed:] *Joel Martinez Santiago*
Joel Martinez Santiago
Telephone: 787-243-1866

DTOP

COMMONWEALTH OF PUERTO RICO
DEPARTMENT OF TRANSPORTATION AND PUBLIC WORKS

April 1, 2009

Joel Martínez Santiago
Mechanical Assistant Automotive Equipment
Ponce Regional Office

[signature]

Amílcar González Ortiz, Ph.D.s
Assistant Administrative Secretary

CERTIFICATION OF DATE OF SENIORITY IN THE PUBLIC SERVICE

Act Number 7 of March 9, 2009, known as the “*Special Act to Declare a State of Fiscal Emergency and to Establish a Comprehensive Fiscal Stabilization Plan to Salvage the Credit of Puerto Rico*,” requires that Agencies certify in writing for its employees, individually, their date of seniority in the public service. In this regard, we gather from the personnel records in our custody that you began to work in the public service on May 10, 1994, and you have a seniority of 14 years and 326 days.

If you are not in agreement with the information certified above, you have the right to present to the Office of Human Resources of this Department a “*Form Contesting Date of Seniority*,” which can be acquired at the Office of Human Resources or by accessing our website at the following URL: <http://intra.dtop.gov.pr/>.

This form must be accompanied by the official documentary evidence issued by the competent government authority or entity that supports your position. Likewise, you will be entitled to state and justify in it, your version in regards to the alleged seniority. The term to submit this form and the official documentary evidence is thirty (30) calendar days from service of process, or the date of remittance of certified mail with notice of receipt of this Certification, as applicable.

If the certified documentary evidence is not presented, or the seniority notified here is not refuted within a term of thirty (30) days, it will be final. If you present, within a term of thirty (30) days a form with certified evidence that contests the notified seniority, we will not make a final determination on it without first giving you an opportunity to have a preliminary hearing.

In order to clarify any questions or obtain additional information on this matter, you can contact the Office of Human Resources using the following numbers: (787) 722-2929, extensions 2171, 2172 and 2424.

Apartado 41269, San Juan, Puerto Rico 00940-1269 * Tel. (787) 722-2929 Fax: (787) 728-8963

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Envelope Page 1 of 1

Joel Martínez Santiago
Urb. Alturas del Cafetal
B-15 Calle Anturio
Yauco, Puerto Rico
00698

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Secretaría (Clerk's Office)
Tribunal de Distrito de los Estados Unidos
Room 150 Federal Building
San Juan, Puerto Rico 00918-1767



T 718.384.8040
W TargemTranslations.com
E projects@targemtranslations.com
A 185 Clymer St. Brooklyn, NY 11211

TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)
TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: Claim No. 37093 - ECF No. 13484 - Mailing Response (3)

Signed this 11th day of November 2020



Verify at www.atanet.org/verify

A handwritten signature in black ink, appearing to read "Andreea I. Boscor".

Andreea I. Boscor

